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**GOTTLIEB & ASSOCIATES**  
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August 26, 2024

**VIA ECF**

The Honorable Analisa Torres  
United States District Judge  
United States District Court  
Southern District of New York  
Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl Street  
New York, NY 10007

Re: *Delacruz v. Rhino Entertainment LLC*,  
Case No.: 1:24-cv-5106

Dear Judge Torres,

The undersigned represents Emanuel Delacruz on behalf of himself and all other persons similarly situated ("Plaintiff") in the above referenced matter against Defendant, Rhino Entertainment LLC, ("Defendant"). The undersigned respectfully requests that Your Honor's deadline to submit the proposed Case Management Plan and Scheduling Order by September 2, 2024 (Dkt. 4) be extended for 60 days because Counsel for Defendant has not yet answered or appeared in this action. This request will grant ample time for the Defendant to retain counsel and for Defendant's Counsel to appear and discuss a possible resolution with Plaintiff's Counsel. This is the Plaintiff's first request for an adjournment.

Respectfully submitted,


GOTTLIEB & ASSOCIATES PLLC

/s/Michael A. LaBollita, Esq.  
Michael A. LaBollita, Esq.

GRANTED. By **November 1, 2024**, the parties shall file their joint letter and proposed case management plan.

SO ORDERED.

Dated: August 28, 2024  
New York, New York

  
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ANALISA TORRES  
United States District Judge